

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

2/17/16 FEB 17 PH

UNITED STATES of AMERICA,
Plaintiff,

v.

- [1] ROCKET LEARNING, LLC,
(Counts 1-28)
- [2] BRENDA PEREZ GARCIA,
(Counts 1-31, 41, 47, and 75)
- [3] JUAN NIEVES RIVERA,
(Counts 1,28, 44, 45, 47-50)
- [4] JOSE ACEVEDO RIVERA,
(Counts 1, 28, 35, 40)
- [5] LYNNETTE ASENCO PLAZA,
(Counts 1, 28, 32-34)
- [6] HECTOR BAEZ VILLANUEVA
(Counts 1, 28, 37, 38, 42, 54-58, 60)
- [7] KAY PAGAN RIVERA
(Counts 1, 28, 36, 39, 40)
- [8] KARENIE LABORDE MUÑIZ
(Counts 1, 28, 59)
- [9] ANNERYS RODRIGUEZ APONTE
(Counts 1, 28, 41, 72)
- [10] LIS GARCIA MEDINA
(Counts 1, 28, 35)
- [11] EDJELEDEIRA MELENDEZ RIVERA
(Counts 1, 28)
- [12] JONATHAN MORALES FEBUS
(Counts 1, 28, 36, 59)
- [13] JEANNETTE RAMIREZ ZAPATA
(Counts 1, 28, 52)
- [14] FRANCISCO SANCHEZ ZAYAS
(Counts 1, 28, 62-65, 69)
- [15] YAMARIS TORRES ORTIZ
(Counts 1, 28, 32, 61, 67, 69)
- [16] SAYRA LOPEZ TORRES
(Counts 1, 28)
- [17] ANITA ORTIZ RODRIGUEZ
(Counts 1, 28, 34, 66, 68)
- [18] SHEILLA PAGAN CARRASQUILLO
(Counts 1, 28, 61, 62, 66, 67, 68, 69)
- [19] ELBA YANIRA JIMENEZ PEREZ

SUPERSEDING INDICTMENT

CRIMINAL NO. 15 - 561 (JAG)

NINETY THREE COUNTS

Violations:

(COUNT ONE)
Conspiracy to Commit Mail Fraud
Title 18, United States Code, §1349; 1341

(COUNTS TWO-TWENTY SEVEN)
Mail Fraud
Title 18, United States Code, § 1341

(COUNT TWENTY EIGHT)
Theft of Government Money and Property
Title 18, United States Code, §641; 2

(COUNTS TWENTY NINE - NINETY
THREE)
Aggravated Identity Theft
Title 18, United States Code, § 1028A(a)(1), 2

Forfeiture Allegation:

Title 21, United States Code, § 981(a)(1)(C)
Title 28, United States Code, § 2461(c)

(Counts 1, 28, 42, 43, 60)
[20] GRETCHEN ROMAN SOTO
(Counts 1, 28, 54-56)
[21] MILLIAM CENTENO SOTO
(Counts 1, 28, 71)
[22] EMMANUEL CRUZ MARTINEZ
(Counts 1, 28)
[23] KATIA TAPIA TORRES
(Counts 1, 28, 57-58)
[24] NORAIMA MERCADO VAZQUEZ
(Counts 1, 28, 70)
[25] NAYRA ALICEA DELGADO
(Counts 1, 28, 50)
[26] EILEEN GUTIERREZ STONE
(Counts 1, 28, 53, 75)
[27] GLORYMAR RODRIGUEZ CASIANO
(Counts 1, 28, 45)
[28] MINERVA MENDOZA ACEVEDO
(Counts 1, 28, 44, 51)
[29] SUHAYL MENDEZ REYES
(Counts 1, 28, 49)
[30] JAVIER REYES LOPEZ
(Counts 1, 28, 73)
[31] LUISA GARCIA ARRIAGA
(Counts 1, 28, 74)
[32] JOSE SANCHEZ BAUZA
(Counts 1, 28, 46, 47)
[33] MARIA PLAZA
(Counts 1, 28, 76)
[34] WANDA FIGUEROA FIGUEROA
(Counts 1, 28, 77)
[35] ARACELIS RIVERA RIVERA
(Counts 1, 28, 76)
[36] ANNETTE COPPIN BALD
(Counts 1, 28, 78)
[37] IDALIS TORRES TORRES
(Counts 1, 28, 79)
[38] JESSICA MARRERO SANTANA
(Counts 1, 28, 80)
[39] KEILA SILVA SANCHEZ
(Counts 1, 28, 81)
[40] MONICA ORTIZ ALICEA
(Counts 1, 28, 82)
[41] NAYDA TORRES DE LEON
(Counts 1, 28, 83)
[42] GUILLERMO MORALES MUÑIZ
(Counts 1, 28, 84)

[43] RAQUEL ROMAN BONILLA
(Counts 1, 28, 85)
[44] JOEL TORRES BELTRAN
(Counts 1, 28, 86)
[45] LAURIE BAERGA CASTRO
(Counts 1, 28, 87)
[46] ANGEL VELEZ ROSA
(Counts 1, 28, 88)
[47] FLORENTINO PEREZ GONZALEZ
(Counts 1, 28, 89)
[48] IVELISSE VAZQUEZ GARCIA
(Counts 1, 28, 90)
[49] MARITZA ROSARIO MEDINA
(Counts 1, 28, 91)
[50] ANA OBEN
(Counts 1, 28, 92)
[51] MARIAM CANDELARIA
(Counts 1, 28, 77)
[52] MARGARITA ARROYO HEREDIA
(Counts 1, 28, 93)

Defendants.

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment:

The Supplemental Educational Services Program:

1. Title I, Part A of the Elementary and Secondary Education Act of 1965 (“ESEA”), as reauthorized by the No Child Left Behind Act of 2001 (“NCLB”), called for parents of eligible students attending Title I schools that have not made adequate yearly progress (“AYP”) in increasing student academic achievement for three years to be provided with opportunities and choices to help ensure that their children achieve at higher levels.

2. The U.S. Department of Education (“US DOE”) distributed federal funds to States and the Commonwealth of Puerto Rico to improve the academic achievement of disadvantaged students

(commonly known as “Title I funds”). In Puerto Rico, Title I funds were distributed by the US DOE to the Puerto Rico Department of Education (“PR DOE”).

3. The PR DOE was permitted to use the Title I funds allocated to them to pay for, among other things, Supplemental Educational Services (“SES”) for after-school tutoring and other remedial and supplemental academic enrichment services.

4. SES programs provide extra academic assistance for eligible children. These services, which are in addition to instruction provided during the school day, may include academic assistance such as tutoring, remediation and other supplemental academic enrichment services.

5. Students from low-income families who were attending Title I schools that were in their second year of school improvement, in corrective action, or in restructuring status, were eligible to receive these services. The tutoring services include the subject areas of reading/language arts, mathematics, and science, as well as English language proficiency for students with limited English proficiency (“LEP”).

6. Parents of eligible students were then notified that SES programs were available, and parents could select any approved provider in their geographic area served or within a reasonable distance of that area that would best meet their child’s needs.

7. Once the registration period closed at the start of the program, the SES providers could not add new students to the program.

8. At all times relevant to this Indictment, the PR DOE used Title I funds to pay SES providers for each student tutored. SES providers were required to submit electronic invoices to the PR DOE for payment, and to maintain certain records, including but not limited to, requests for services forms (SES-101), achievement reports (SES-102), daily student attendance sheets (SES-104) for students who received tutoring services. The program also required that the agreed upon procedures report be signed by a Certified Public Accountant.

Safeguards:

9. As a safeguard to limit potential fraud, the PR DOE agreed only to pay providers for the hours of service actually provided to any individual student. As a result, the provider could not bill for the entire contract amount if the student did not attend the entire SES program.

10. Further, to ensure that attendance was accurately recorded, a biometric system was utilized wherein the students and teachers would use a biometric system to register the time they checked-in and checked-out each day of the SES program. The biometric equipment and software was made available by a technology company, with the initial E.G.L., for each location being utilized by the SES provider. The SES provider would transmit the biometric attendance information via internet to E.G.L., who in turn would compile and make that attendance information available to the PR DOE and the SES provider via an online program called “AsisTEC”.

11. At the beginning of each SES program year, the finger of each student and teacher would be programmed into the system by having the student or teacher press their finger approximately five (5) times. This process was conducted at the school by an employee of the SES provider. The finger corresponding to a specific student or teacher could be changed at any time by re-registering a new finger in the system for that individual. A new finger would be scanned approximately five (5) times and assigned to whichever person was selected in the system, regardless of whether that selected person was present.

12. At all times relevant to this Indictment, there was no limitation on the number of times the finger could be changed in the biometric system. Further, the biometric system did not compare registered fingers to others in the system and did not save the biometric information of fingers previously used; therefore, making it useless in detecting fraud.

13. In addition to biometric attendance, SES providers were permitted to manually enter the attendance of students into the AsisTEC program using assigned usernames and passwords. These “manual entries” could not exceed 10% of the total invoice, and were permitted for billing purposes only

if supported by the proper documentary support, an SES-104 form.

14. The SES-104 form details the school, teacher, student, date, and time of the attendance at issue, which should reflect the manual entry made in the AsisTEC program. In order to ensure the accuracy of the information, the SES-104 specifically requires the signature of the teacher, student, parent, and certification by the SES provider.

15. Additionally, a pre-test and post-test were required to be conducted for each student if full payment for the SES program was to be received. These tests were administered by a separate company, with the initials of T.I.S.P.R.I., who provided the test results to the SES provider. The SES provider was required to notify the parents of the post-SES program test results in order to invoice for the full service. This notice was reflected on the SES 102-post form, which contained the test results and the parent's signature and was submitted to the PRDOE.

Relevant Persons and Entities:

16. At all times relevant to this Indictment, Rocket Learning, Inc. ("Rocket") was a corporation registered with the Puerto Rico Department of State that provided a variety of educational services, including SES tutoring. From in or about 2011 through in or about 2013, Rocket provided SES tutoring at Puerto Rico public schools pursuant to contracts with the PR DOE and maintained offices in San Juan, Puerto Rico and other regional sites in Puerto Rico, to manage its SES business in Puerto Rico.

17. From in or about 2011 through in or about 2013, Rocket received in total approximately \$34,503,096.98 in Title I funds for its SES program in Puerto Rico. During that period, Rocket received approximately \$17,263,525.35 for the 2011/2012 academic year, and approximately \$17,239,571.63 for the 2012/2013 academic year.

18. At all times relevant to this Indictment, Rocket maintained a hierarchy of positions within its Puerto Rico SES division:

- a. Employees with the title "Maestro Lider" or "Teacher Leader" were assigned to oversee Rocket's SES program in each school, supervising other employees, known as "maestros" or "teachers" who were also assigned to those schools to provide tutoring and academic services to the students. Among other things, Teacher Leaders were responsible for administering the biometric attendance system for their individual school. The teachers were responsible for, among other things, ensuring that their students' attendance was accurately recorded using the biometric attendance system or supported by an accurate attendance sheet (Form SES-104), which were used to calculate the amount of Title I funds Rocket would be paid for providing SES tutoring.
 - b. Employees with the title "Program Manager" supervised multiple Teacher Leaders, had access to and reviewed the AsisTEC attendance data, and were responsible for obtaining all supporting documentation used to calculate the amount of Title I funds Rocket would be paid for providing SES tutoring.
 - c. The Program Managers reported to one of several "Regional Directors", who supervised Rocket's SES program in San Juan, Ponce, Caguas, and Arecibo. The Regional Directors had electronic access to make manual attendance entries in the AsisTEC system used to calculate the amount of Title I funds Rocket would be paid for providing SES tutoring.
 - d. Each Regional Director also supervised an "Operation Coordinator", who assisted in monitoring and making entries to the AsisTEC system that were used to calculate the Title I funds Rocket would be paid for providing SES tutoring.
 - e. The Regional Program Managers were supervised by the "SES Director", who was the head of Rocket's SES program.
19. At all times relevant to this Indictment, the following defendants were employed and/or contracted by Rocket:

- a. Brenda Perez Garcia – SES Director
- b. Juan Nieves Rivera Rivera – Director of San Juan Region
- c. Jose Acevedo Rivera – Director of Caguas Region
- d. Lynnette Asencio Plaza – Director of Ponce Region
- e. Hector Baez Villanueva – Director of Arecibo Region
- f. Kay Pagan Rivera – Program Manager in Caguas Region
- g. Karenie Laborde Muñiz – Program Manager in Caguas Region
- h. Annerys Rodriguez Aponte – Program Manager in Caguas Region
- i. Lis Garcia Medina – Program Manager in Caguas Region
- j. Edjeledeira Melendez-Rivera – Jr. Program Manager in Caguas Region
- k. Jonathan Morales Febus – Operation Coordinator in Caguas Region
- l. Jeannette Ramirez-Zapata – Program Manager in Ponce Region
- m. Franciscó Sanchez Zayas – Program Manager in Ponce Region
- n. Yamaris Torres Ortiz – Program Manager in Ponce Region
- o. Sayra Lopez Torres – Program Manager in Ponce Region
- p. Anita Ortiz Rodriguez – Program Manager in Ponce Region
- q. Sheilla Pagan Carrasquillo – Operation Coordinator in Ponce Region
- r. Elba Yanira Jimenez Perez – Program Manager in Arecibo Region
- s. Gretchen Roman Soto – Program Manager in Arecibo Region
- t. Milliam Centeno Soto – Program Manager in Arecibo Region
- u. Emmanuel Cruz Martinez – Program Manager in Arecibo Region
- v. Katia Tapia Torres – Program Manager in Arecibo Region
- w. Noraima Mercado Vazquez – Program Manager in Arecibo Region
- x. Nayra Alicea Delgado – Program Manager in San Juan Region

- y. Eileen Gutierrez Stone – Program Manager in San Juan Region
- z. Glorymar Rodriguez Casiano – Program Manager in San Juan Region
- aa. Minerva Mendoza Acevedo – Program Manager in San Juan Region
- bb. Suhayl Mendez Reyes – Program Manager in San Juan Region
- cc. Javier Reyes Lopez – Program Manager in San Juan Region
- dd. Luisa Garcia Arriaga – Program Manager in San Juan Region
- ee. Jose Sanchez Bauza – Program Manager in San Juan Region
- ff. Maria Plaza – Teacher Leader at Hector I. Rivera School
- gg. Wanda Figueroa Figueroa – Teacher Leader at Antonio Serrano Gonzalez School
- hh. Aracelis Rivera Rivera – Teacher at Hector I. Rivera School
- ii. Annette Coppin Bald – Teacher at Ines Maria Mendoza School
- jj. Idalis Torres Torres – Teacher at Nueva Superior de Loiza School
- kk. Jessica Marrero Santana – Teacher at Eugenio Maria de Hostos School
- ll. Keila Silva Sanchez – Teacher at Jesus T. Piñero School
- mm. Monica Ortiz Alicea – Teacher at Antonia Saez Irizarry School
- nn. Nayda Torres De Leon – Teacher at Maria Dolores Faria School
- oo. Guillermo Morales Muñiz – Teacher at Francisco Matias Lugo School
- pp. Raquel Roman Bonilla – Teacher at Joaquin Vazquez Cruz School
- qq. Joel Torres Beltran – Teacher at Manuel Mendez Liciaga School
- rr. Laurie Baerga Castro – Teacher at Adrian Torres Torres School
- ss. Angel Velez Rosa – Teacher at Berwind Intermedia School
- tt. Florentino Perez Gonzalez – Teacher at Berwind Intermedia School
- uu. Ivelisse Vazquez Garcia – Teacher at Dr. Ramon Mellado School
- vv. Maritza Rosario Medina – Teacher at Antonia Serrano Gonzalez School

ww. Ana Oben – Teacher at Luis Muñoz Rivera School

xx. Mariam Candelaria – Teacher at Antonia Serrano Gonzalez School

yy. Margarita Arroyo Heredia – Teacher at Antonia Serrano Gonzalez School

20. On or about March 10, 2014, Rocket Learning, Inc. changed to a limited liability company and began operating under the name Rocket Learning, LLC.

The Scheme to Defraud

21. From in or about 2011 through in or around 2013, Rocket and its teachers, teacher leaders, program managers, operational coordinators, regional directors, and SES director, engaged in a scheme to defraud by invoicing and charging PR DOE for services that were not rendered or were not payable under Rocket's contract with PR DOE:

22. The scheme to defraud included falsely reporting to PR DOE that Rocket had provided SES tutoring for specific hours to specific students when, in fact, not all of the invoiced services for SES tutoring had been provided to all of the students.

23. The scheme to defraud included the submission of false documents to PR DOE for the purpose of causing Rocket to receive payment of Title I funds.

24. The scheme to defraud included, but was not limited to: the fabrication of false biometric attendance records; false records supporting manual attendance entries; false records supporting the notification of the post-test; and forging the signatures of students, parents, and teachers in the records.

25. The scheme to defraud also included an incentive payment program for Rocket's managers, regional directors, and SES director, which was proportional to the total amount of money invoiced for the corresponding area of supervision.

26. From in or about 2011-2013 Rocket, through its employees and/or contractors, submitted approximately twenty-six (26) invoices containing, and supported by, false information and forged signatures, and knowingly caused the PR DOE to issue approximately twenty-six (26) checks totaling

\$34,503,096.98 in Title I funds, which were made payable, and sent via mail, to Rocket Learning, Inc.

COUNT ONE
Conspiracy to Commit Mail Fraud
18 U.S.C. §§ 1349 and 1341

27. Paragraphs 1-26 are hereby re-alleged as if set forth herein.
28. From in or about 2011, up to and including in or about 2013, in the District of Puerto Rico and within the jurisdiction of this Court,

[1] ROCKET LEARNING, LLC,
[2] BRENDA PEREZ GARCIA,
[3] JUAN NIEVES RIVERA,
[4] JOSE ACEVEDO RIVERA,
[5] LYNNETTE ASENCO PLAZA,
[6] HECTOR BAEZ VILLANUEVA,
[7] KAY PAGAN RIVERA,
[8] KARENIE LABORDE MUÑIZ,
[9] ANNERYS RODRIGUEZ APONTE,
[10] LIS GARCIA MEDINA,
[11] EDJELEDEIRA MELENDEZ RIVERA,
[12] JONATHAN MORALES FEBUS,
[13] JEANNETTE RAMIREZ ZAPATA,
[14] FRANCISCO SANCHEZ ZAYAS,
[15] YAMARIS TORRES ORTIZ,
[16] SAYRA LOPEZ TORRES,
[17] ANITA ORTIZ RODRIGUEZ,
[18] SHEILLA PAGAN CARRASQUILLO,
[19] ELBA YANIRA JIMENEZ PEREZ,
[20] GRETCHEN ROMAN SOTO,
[21] MILLIAM CENTENO SOTO,
[22] EMMANUEL CRUZ MARTINEZ,
[23] KATIA TAPIA TORRES,
[24] NORAIMA MERCADO VAZQUEZ,
[25] NAYRA ALICEA DELGADO,
[26] EILEEN GUTIERREZ STONE,
[27] GLORYMAR RODRIGUEZ CASIANO,
[28] MINERVA MENDOZA ACEVEDO,
[29] SUHAYL MENDEZ REYES,
[30] JAVIER REYES LOPEZ,
[31] LUISA GARCIA ARRIAGA,
[32] JOSE SANCHEZ BAUZA,
[33] MARIA PLAZA,
[34] WANDA FIGUEROA FIGUEROA,
[35] ARACELIS RIVERA RIVERA,

[36] ANNETTE COPPIN BALD,
[37] IDALIS TORRES TORRES,
[38] JESSICA MARRERO SANTANA,
[39] KEILA SILVA SANCHEZ,
[40] MONICA ORTIZ ALICEA,
[41] NAYDA TORRES DE LEON,
[42] GUILLERMO MORALES MUÑIZ,
[43] RAQUEL ROMAN BONILLA,
[44] JOEL TORRES BELTRAN,
[45] LAURIE BAERGA CASTRO,
[46] ANGEL VELEZ ROSA,
[47] FLORENTINO PEREZ GONZALEZ,
[48] IVELISSE VAZQUEZ GARCIA,
[49] MARITZA ROSARIO MEDINA,
[50] ANA OBEN,
[51] MARIAM CANDELARIA,
[52] MARGARITA ARROYO HEREDIA

the defendants herein, together with others known and unknown, did knowingly and willfully combine, conspire, confederate and agree, with each other, and with others known and unknown to the Grand Jury, to commit an offense contained in Chapter 63, of Title 18, of the United States Code, namely to devise a scheme and artifice to defraud and obtain money by means of false and fraudulent pretenses, representations, and promises and for the purpose of executing the scheme and artifice, knowingly caused to be delivered by mail at the place at which it is directed to be delivered by the person to whom it is addressed approximately twenty six (26) checks payable to Rocket Learning, Inc. for SES services from 2011-2013 in violation of Title 18, United States Code, Section 1341. All in violation Title 18, United States Code, Section 1349.

Object of the Conspiracy

29. It was the purpose and object of the conspiracy for the defendants and others known and unknown to the Grand Jury, to conspire, engage in deceptive conduct designed to fraudulently obtain Title I funds, and to devise a scheme and artifice to fraudulently obtain Title I funds for Rocket via checks

mailed by the PR DOE, which were based largely upon falsified and forged SES records, signatures, documents, biometric data, and attendance information.

Manner and Means of the Conspiracy

30. It was part of the manner and means of the conspiracy that:

31. Biometric attendance equipment was present at each school utilized by Rocket as a part of the SES program and was under the custody and control of a Rocket employee, the Teacher Leader. The biometric attendance equipment consisted of a computer and a scanning device that would take partial pictures of the finger and match it to the registered finger for the specific person. Actual fingerprints were not recorded.

32. The individual teacher and students were required to “punch” their finger to check-in and check-out for the day. The biometric system would match their finger and create a daily log of the individuals who attended and the total time they were on site. Students were required to receive at least two (2) hours of tutoring in a given day for Rocket to be able to bill for the services.

33. Though there could be legitimate reasons to re-register a student’s finger, Rocket employees falsified the biometric attendance data so that students that had transferred or were absent would appear present. This was done by re-registering the transferred/absent student with the finger of another student or teacher who was present that day. This task could be done as many times as necessary and each instance of re-registration was recorded.

34. Rocket was able to artificially inflate their attendance and would bill for the SES program even though those students were not actually receiving the tutoring services. By falsifying the biometric attendance records, Rocket also gained the ability to submit additional manual entries without reaching the 10% limit.

35. Further, Rocket employees had online access to AsisTEC, a computerized system, wherein they could review the biometric attendance of their students and could enter additional manual entries that

were invoiced to the PR DOE. The AsisTEC program was updated as additional records were uploaded from the sites or manual entries were made.

36. Rocket trained its employees to use the AsisTec program and to differentiate which attendance entries would count toward the 10% limit. This training included, but was not limited to, instructions that manual entries in the AsisTec program for “ghost” or “phantom” students with no registered biometric attendance for a given day would count toward the 10% limit.

37. Approximately 35,000 manual entries were made by Rocket between 2011-2013.

38. Each manual entry was required to be supported by a daily attendance sheet (form SES-104), which included the date and time of the service, and the certified signatures of the teacher, student, and parent.

39. The SES-104 forms would be provided to a certified public accountant, who would certify that all of the invoiced SES-104 forms were reviewed and that the signatures of the parents matched the initial registration documentation (SES-101) and post-test notification form (SES 102-post).

40. In furtherance of the conspiracy and scheme to defraud, manual entries were made into the AsisTEC system by Rocket employees without any supporting documentation and without knowledge of attendance. Reports would then be generated showing the manual entries that had to be justified with an SES-104 form.

41. In furtherance of the conspiracy and scheme to defraud, manual entries were made into the AsisTEC system by Rocket employees for “ghost” or “phantom” students who did not receive SES tutoring on the dates reflected in the manual entry.

42. In furtherance of the conspiracy and scheme to defraud, Rocket employees would belatedly forge the signatures of parents, teachers, and/or students on the SES-104 forms with the necessary dates and times in order to justify the manual entries already reflected in the AsisTEC program.

43. In furtherance of the conspiracy and scheme to defraud, blank SES-104 forms were sent to the

teachers with instructions to obtain a certain number of signatures of the student, parent, and teacher so that the necessary attendance data could be added later.

44. In furtherance of the conspiracy and scheme to defraud, dates, times, and dollar figures were altered by Rocket employees on existing SES-104 forms to support manual entries previously made in the AsisTEC system.

45. In furtherance of the conspiracy and scheme to defraud, line entries were added with forged signatures to support manual entries made in the AsisTEC system.

46. Parents were incentivized to sign blank or incorrect SES-104 forms because unless the full number of service hours was documented, the student was not able to receive an electronic tablet, which Rocket offered at the beginning of the program to convince parents to select Rocket rather than other competitors.

47. All in violation Title 18, United States Code, § 1349.

COUNTS TWO – TWENTY SEVEN
Mail Fraud Counts
18 U.S.C. § 1341

Introduction

48. The Grand Jury realleges and incorporates by reference as though fully set forth herein, the allegations contained in paragraphs 1-47 of this Indictment.

Scheme and Artifice to Defraud

49. It was part of the scheme and artifice to defraud that defendants **ROCKET LEARNING, LLC** and **BRENDA PEREZ GARCIA** engaged in deceptive conduct designed to fraudulently obtain Title I funds via checks mailed by the PR DOE to Rocket, which were based on falsified and forged SES records, signatures, documents, biometric data, and attendance information as described in Count One of this Indictment, the allegations of which are incorporated by reference as though fully set forth herein.

50. It was further part of the scheme and artifice to defraud that defendants **ROCKET LEARNING, LLC**, and **BRENDA PEREZ GARCIA** forged signatures on SES-104 forms, made alterations and falsified dates and monetary amounts on SES-104 forms, made and permitted to be made false attendance entries in the AsisTEC system without knowledge and supporting documentation for attendance, otherwise instructed Rocket employees to “rescue” hours and “do the impossible” to fraudulently inflate attendance, and approved materially fraudulent invoices for the purpose of fraudulently causing Title I funds to be sent via mail in checks payable to Rocket for services that were not rendered or for which Rocket was not otherwise authorized to receive.

51. From in or about 2011, up to and including in or about 2013, in the District of Puerto Rico and within the jurisdiction of this Court, the defendants **ROCKET LEARNING, LLC** and **BRENDA PEREZ GARCIA**, with intent to defraud, devised, and willfully participated in the above-described scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises.

52. From in or about 2011, up to and including in or about 2013, in the District of Puerto Rico and within the jurisdiction of this Court, for the purpose of executing or attempting to execute the above described scheme and artifice to defraud and deprive, the defendants **ROCKET LEARNING, LLC** and **BRENDA PEREZ GARCIA** knowingly caused to be delivered by U.S. Mail at the place at which it was directed to be delivered by the person to whom it was addressed the following matters:

COUNT	DEFENDANTS	DESCRIPTION OF ITEM CAUSED TO BE MAILED	MAILED TO
2	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00329115 dated July 24, 2012 payable to Rocket Learning, Inc. in the amount of \$87,073.88	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
3	ROCKET LEARNING, LLC and BRENDA	Check Number 00336041 dated August 30, 2012 payable to	Rocket Learning Inc. PMB 425

	PEREZ GARCIA	Rocket Learning, Inc. in the amount of \$1,644,648.56	138 Ave. Winston Churchill San Juan, Puerto Rico
4	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00336042 dated August 30, 2012 payable to Rocket Learning, Inc. in the amount of \$603,492.47	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
5	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00336043 dated August 30, 2012 payable to Rocket Learning, Inc. in the amount of \$560,910.75	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
6	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00336044 dated August 30, 2012 payable to Rocket Learning, Inc. in the amount of \$1,626,672.95	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
7	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00336045 dated August 30, 2012 payable to Rocket Learning, Inc. in the amount of \$1,916,014.58	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
8	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00338347 dated September 10, 2012 payable to Rocket Learning, Inc. in the amount of \$2,816,276.64	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
9	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00338348 dated September 10, 2012 payable to Rocket Learning, Inc. in the amount of \$1,442,733.38	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
10	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00338349 dated September 10, 2012 payable to Rocket Learning, Inc. in the amount of \$1,288,856.09	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
11	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00338350 dated September 10, 2012 payable to Rocket Learning, Inc. in the amount of \$1,886,376.69	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
12	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00338351 dated September 10, 2012 payable to Rocket Learning, Inc. in the amount of \$2,557,620.45	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
13	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00338352 dated September 10, 2012 payable to Rocket Learning, Inc. in the amount of \$654,853.11	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
14	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00338353 dated September 10, 2012 payable to Rocket Learning, Inc. in the amount of \$177,993.80	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico

15	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00388988 dated May 2, 2013 payable to Rocket Learning, Inc. in the amount of \$2,103,347.73	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
16	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00388989 dated May 2, 2013 payable to Rocket Learning, Inc. in the amount of \$1,959,519.30	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
17	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00394469 dated May 21, 2013 payable to Rocket Learning, Inc. in the amount of \$1,752,475.26	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
18	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00394470 dated May 21, 2013 payable to Rocket Learning, Inc. in the amount of \$1,943,671.17	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
19	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00394471 dated May 21, 2013 payable to Rocket Learning, Inc. in the amount of \$1,957,075.25	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
20	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00394472 dated May 21, 2013 payable to Rocket Learning, Inc. in the amount of \$1,974,770.17	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
21	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00394473 dated May 21, 2013 payable to Rocket Learning, Inc. in the amount of \$8,842.40	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
22	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00394474 dated May 21, 2013 payable to Rocket Learning, Inc. in the amount of \$1,952,915.79	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
23	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00394475 dated May 21, 2013 payable to Rocket Learning, Inc. in the amount of \$441,049.44	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
24	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00394476 dated May 21, 2013 payable to Rocket Learning, Inc. in the amount of \$2,198,937.14	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
25	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00394477 dated May 21, 2013 payable to Rocket Learning, Inc. in the amount of \$933,507.32	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico
26	ROCKET LEARNING, LLC and BRENDA	Check Number 00394478 dated May 21, 2013 payable to Rocket	Rocket Learning Inc. PMB 425

	PEREZ GARCIA	Learning, Inc. in the amount of \$1,940.28	138 Ave. Winston Churchill San Juan, Puerto Rico
27	ROCKET LEARNING, LLC and BRENDA PEREZ GARCIA	Check Number 00394479 dated May 21, 2013 payable to Rocket Learning, Inc. in the amount of \$11,520.38	Rocket Learning Inc. PMB 425 138 Ave. Winston Churchill San Juan, Puerto Rico

53. Each Count a separate and distinct violation of Title 18, United States Code, Section 1341.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

COUNT TWENTY EIGHT
Theft of Government Money and Property
18 U.S.C. §§ 641 & 2

54. The Grand Jury realleges and incorporates by reference as though fully set forth herein, the allegations contained in paragraphs 1-53 of this Indictment.

55. From in or about 2011, up to and including in or about 2013, in the District of Puerto Rico and within the jurisdiction of this Court,

- [1] ROCKET LEARNING, LLC,
- [2] BRENDA PEREZ GARCIA,
- [3] JUAN NIEVES RIVERA,
- [4] JOSE ACEVEDO RIVERA,
- [5] LYNNETTE ASENIO PLAZA,
- [6] HECTOR BAEZ VILLANUEVA,
- [7] KAY PAGAN RIVERA,
- [8] KARENIE LABORDE MUÑIZ,
- [9] ANNERYS RODRIGUEZ APONTE,
- [10] LIS GARCIA MEDINA,
- [11] EDJELEDEIRA MELENDEZ RIVERA,
- [12] JONATHAN MORALES FEBUS,
- [13] JEANNETTE RAMIREZ ZAPATA,
- [14] FRANCISCO SANCHEZ ZAYAS,
- [15] YAMARIS TORRES ORTIZ,
- [16] SAYRA LOPEZ TORRES,
- [17] ANITA ORTIZ RODRIGUEZ,
- [18] SHEILLA PAGAN CARRASQUILLO,
- [19] ELBA YANIRA JIMENEZ PEREZ,
- [20] GRETCHEN ROMAN SOTO,
- [21] MILLIAM CENTENO SOTO,
- [22] EMMANUEL CRUZ MARTINEZ,
- [23] KATIA TAPIA TORRES,
- [24] NORAIMA MERCADO VAZQUEZ,
- [25] NAYRA ALICEA DELGADO,
- [26] EILEEN GUTIERREZ STONE,
- [27] GLORYMAR RODRIGUEZ CASIANO,
- [28] MINERVA MENDOZA ACEVEDO,
- [29] SUHAYL MENDEZ REYES,
- [30] JAVIER REYES LOPEZ,
- [31] LUISA GARCIA ARRIAGA,
- [32] JOSE SANCHEZ BAUZA,
- [33] MARIA PLAZA,

[34] WANDA FIGUEROA FIGUEROA,
[35] ARACELIS RIVERA RIVERA,
[36] ANNETTE COPPIN BALD,
[37] IDALIS TORRES TORRES,
[38] JESSICA MARRERO SANTANA,
[39] KEILA SILVA SANCHEZ,
[40] MONICA ORTIZ ALICEA,
[41] NAYDA TORRES DE LEON,
[42] GUILLERMO MORALES MUÑIZ,
[43] RAQUEL ROMAN BONILLA,
[44] JOEL TORRES BELTRAN,
[45] LAURIE BAERGA CASTRO,
[46] ANGEL VELEZ ROSA,
[47] FLORENTINO PEREZ GONZALEZ,
[48] IVELISSE VAZQUEZ GARCIA,
[49] MARITZA ROSARIO MEDINA,
[50] ANA OBEN,
[51] MARIAM CANDELARIA,
[52] MARGARITA ARROYO HEREDIA

the defendants herein, aiding and abetting each other, willfully and knowingly did steal, purloin, and convert to the use of another a thing of value of the United States in an amount over \$1,000, that is \$954,297.00 in Title I federal grant funds.

56. All in violation of Title 18, United States Code, Sections 641, and 2.

COUNTS TWENTY NINE – NINETY THREE
Aggravated Identity Theft
18 U.S.C. § 1028A and 2

57. The Grand Jury, realleges and incorporates by reference as though fully set forth herein, the allegations contained in paragraphs 1-56 of this Indictment.

58. On or about the dates listed below, in the District of Puerto Rico, elsewhere and within the jurisdiction of this Court,

[2] BRENDA PEREZ GARCIA,
[3] JUAN NIEVES RIVERA,
[4] JOSE ACEVEDO RIVERA,
[5] LYNNETTE ASENCIO PLAZA,
[6] HECTOR BAEZ VILLANUEVA,
[7] KAY PAGAN RIVERA,

[8] KARENIE LABORDE MUÑIZ,
[9] ANNERYS RODRIGUEZ APONTE,
[10] LIS GARCIA MEDINA,
[12] JONATHAN MORALES FEBUS,
[13] JEANNETTE RAMIREZ ZAPATA,
[14] FRANCISCO SANCHEZ ZAYAS,
[15] YAMARIS TORRES ORTIZ,
[17] ANITA ORTIZ RODRIGUEZ,
[18] SHEILLA PAGAN CARRASQUILLO,
[19] ELBA YANIRA JIMENEZ PEREZ,
[20] GRETCHEN ROMAN SOTO,
[21] MILLIAM CENTENO SOTO,
[23] KATIA TAPIA TORRES,
[24] NORAIMA MERCADO VAZQUEZ,
[25] NAYRA ALICEA DELGADO,
[26] EILEEN GUTIERREZ STONE,
[27] GLORYMAR RODRIGUEZ CASIANO,
[28] MINERVA MENDOZA ACEVEDO,
[29] SUHAYL MENDEZ REYES,
[30] JAVIER REYES LOPEZ,
[31] LUISA GARCIA ARRIAGA,
[32] JOSE SANCHEZ BAUZA,
[33] MARIA PLAZA,
[34] WANDA FIGUEROA FIGUEROA,
[35] ARACELIS RIVERA RIVERA,
[36] ANNETTE COPPIN BALD,
[37] IDALIS TORRES TORRES,
[38] JESSICA MARRERO SANTANA,
[39] KEILA SILVA SANCHEZ,
[40] MONICA ORTIZ ALICEA,
[41] NAYDA TORRES DE LEON,
[42] GUILLERMO MORALES MUÑIZ,
[43] RAQUEL ROMAN BONILLA,
[44] JOEL TORRES BELTRAN,
[45] LAURIE BAERGA CASTRO,
[46] ANGEL VELEZ ROSA,
[47] FLORENTINO PEREZ GONZALEZ,
[48] IVELISSE VAZQUEZ GARCIA,
[49] MARITZA ROSARIO MEDINA,
[50] ANA OBEN,
[51] MARIAM CANDELARIA,
[52] MARGARITA ARROYO HEREDIA

the defendants herein, aiding and abetting each other, did knowingly and willfully cause the transfer, possession, and use, without lawful authority, of a means of identification of another person, to wit: the

name and signature of other real persons whose initials appear below, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: under Title 18, United States Code, Sections 641, 1341, and 1349 as charged in Counts One through Twenty Eight, in violation of Title 18, United States Code, Sections 1028A(a)(l) and 2:

COUNT	DEFENDANTS	DATE/DESCRIPTION	IDENTIFICATION
29	BRENDA PEREZ GARCIA	SES-104 for student A.R.R. (student ID xxxx1826) at school 23309 signed by Kay Pagan Rivera dated April 5, 2013	Name and signature of A.R.R.
30	BRENDA PEREZ GARCIA	SES-104 for student N.R.V. (student ID xxxx6286) at school 20685 signed by C.S.R. dated May 29, 2012	Name and signature of N.R.V.
31	BRENDA PEREZ GARCIA	SES-104 for student A.R.C. (student ID xxxx3981) at school 36335 signed by Annerys Rodriguez Aponte dated June 5, 2012	Name and signature of A.R.C.
32	LYNNETTE ASENCIO PLAZA and YAMARIS TORRES ORTIZ	SES-104 for student I.T.R. (student ID xxxx1240) at school 51425 signed by Yamaris Torres Ortiz dated May 7, 2012	Name and signature of I.T.R.
33	LYNNETTE ASENCIO PLAZA	SES-104 for student S.G.O. (student ID xxxx7214) at school 52530 signed by Lynnette Asencio Plaza on January 3, 2013	Name and signature of S.G.O.
34	LYNNETTE ASENCIO PLAZA and ANITA ORTIZ RODRIGUEZ	SES-104 form for student J.R.C. (student ID xxxx6763) at school 54965 signed by Anita Ortiz Rodriguez dated February 22, 2013	Name and signature of J.R.C.
35	JOSE ACEVEDO RIVERA and LIS GARCIA MEDINA	SES-104 form for student K.T.T. (student ID xxxx0024) at school 30874 signed by Lis Garcia Medina dated February 14, 2013	Name and signature of K.T.T.
36	KAY PAGAN RIVERA and JONATHAN MORALES FEBUS	SES-104 for student W.V.P. (student Id xxxx5346) at school 21279 signed by Kay Pagan Rivera on February 15, 2013	Name and signature of W.V.P.
37	HECTOR BAEZ VILLANUEVA	SES-104 for student V.C.P. (student ID xxxx1200) at school 71126 signed by Hector Baez Villanueva dated April 22, 2013	Name and signature of V.C.P.
38	HECTOR BAEZ VILLANUEVA	SES-104 form for student S.M.R. (student ID xxxx5376) at school 71126 signed by Hector Baez Villanueva dated	Name and signature of S.M.R.

		April 22, 2013	
39	KAY PAGAN RIVERA	SES-104 for student N.D.V. (student ID xxxx5214) at school 21097 signed by Kay Pagan Rivera on March 12, 2013	Name and signature of N.D.V.
40	JOSE ACEVEDO RIVERA and KAY PAGAN RIVERA	SES-104 for student A.G.R. (student ID xxxx5214) at school 21642 signed by Kay Pagan Rivera on April 1, 2013	Name and signature of A.G.R.
41	BRENDA PEREZ GARCIA and ANNERYS RODRIGUEZ APONTE	SES-104 for student S.R.F. (student ID xxxx3152) at school 36335 signed by Annerys Rodriguez Aponte dated June 14, 2012	Name and signature of S.R.F.
42	HECTOR BAEZ VILLANUEVA and ELBA YANIRA JIMENEZ PEREZ	SES-104 for student V.O.A. (student ID xxxx3635) at school 42119 signed by Elba Yanira Jimenez Perez dated May 31, 2012	Name and signature of V.O.A.
43	ELBA YANIRA JIMENEZ PEREZ	SES-104 for student R.R.P. (student ID xxxx1863) at school 42119 signed by Elba Yanira Jimenez Perez dated May 31, 2012	Name and signature of R.R.P.
44	JUAN NIEVES RIVERA and MINERVA MENDOZA	SES-104 for student P.C.F. (student ID xxxx2924) at school 62562 signed by Minerva Mendez dated May 11, 2012	Name and signature of P.C.F.
45	JUAN NIEVES RIVERA and GLORYMAR RODRIGUEZ CASIANO	SES-104 form for student S.V.B. (student ID xxxx0450) at school 75788 signed by Glorymar Rodriguez Casiano	Name and signature of S.V.B.
46	JOSE SANCHEZ BAUZA	SES-104 for student A.D.F (student ID xxxx8056) at school 62562 signed by Jose Sanchez Bauza dated May 5, 2012	Name and signature of A.D.F.
47	BRENDA PEREZ GARCIA and JUAN NIEVES RIVERA and JOSE SANCHEZ BAUZA	SES-104 for student E.L.V. (student ID xxxx1312) at school 67934 signed by Jose Sanchez Bauza dated March 21, 2013	Name and signature of E.L.V.
48	JUAN NIEVES RIVERA	SES-104 for student M.L.M. (student ID xxxx1208) at school 65078 signed for Rocket Learning dated June 14, 2012	Name and signature of M.L.M.
49	JUAN NIEVES RIVERA and SUHAYL MENDEZ REYES	SES-104 for student J.V.R. (student ID xxxx0595) at school 71647 signed by Suhayl Mendez Reyes dated June 16, 2012	Name and signature of J.V.R.
50	JUAN NIEVES RIVERA and NAYRA ALICEA	SES-104 for student J.B. (student ID xxxx8449) at school 65268 signed by Nayra Alicea Delgado dated February 11,	Name and signature of J.B.

	DELGADO	2013	
51	MINERVA MENDOZA	SES-104 for student L.P.R. (student ID xxxx2766) at school 69146 signed by Minerva Mendoza dated February 14, 2012	Name and signature of L.P.R.
52	JEANNETTE RAMIREZ ZAPATA	SES-104 for student V.O.T. (student ID xxxx2717) at school 53280 signed by Jeannette Ramirez Zapata dated May 17, 2012	Name and signature of V.O.T.
53	EILEEN GUTIERREZ	SES-104 for student A.L.P. (student ID xxxx9194) at school 69187 signed by Eileen Gutierrez dated May 8, 2012	Name and signature of A.L.P.
54	HECTOR BAEZ VILLANUEVA and GRETCHEN ROMAN SOTO	SES-104 for student N.T.G. (student ID xxxx2597) at school 10785 signed by Gretchen Roman Soto dated February 2, 2013	Name and signature of N.T.G.
55	HECTOR BAEZ VILLANUEVA and GRETCHEN ROMAN SOTO	SES-104 for student R.M.V. (student ID xxxx8135) at school 10785 signed by Gretchen Roman Soto dated February 2, 2013	Name and signature of R.M.V.
56	HECTOR BAEZ VILLANUEVA and GRETCHEN ROMAN SOTO	SES-104 for student J.M.V. (student ID xxxx6966) at school 10785 signed by Gretchen Roman Soto dated February 2, 2013	Name and signature of J.M.V.
57	HECTOR BAEZ VILLANUEVA and KATIA TAPIA TORRES	SES-104 for student C.M.P. (student ID xxxx20766821) at school 71761 signed by Katia Tapia dated March 13, 2013	Name and signature of C.M.P.
58	HECTOR BAEZ VILLANUEVA and KATIA TAPIA TORRES	SES-104 for student V.C.D. (student ID xxxx8354) at school 71761 signed by Katia Tapia Torres dated March 13, 2013	Name and signature of V.C.D.
59	KARENIE LABORDE MUÑIZ and JONATHAN MORALES FEBUS	SES-104 for student S.R.C. (student ID xxxx2389) at school 32367 signed by Karenie Laborde Muñiz dated March 14, 2013	Name and signature of S.R.C.
60	HECTOR BAEZ VILLANUEVA and ELBA YANIRA JIMENEZ PEREZ	SES-104 for student D.D. (student ID xxxx5828) at school 42267 signed by Elba Yanira Jimenez Perez dated February 4, 2013	Name and signature of D.D.
61	YAMARIS TORRES ORTIZ and SHEILLA PAGAN CARRASQUILLO	SES-104 forms for student K.R.R. (student ID xxxx8142) at school 51458 signed by Yamaris Torres Ortiz dated February 2, 2013	Name and signature of K.R.R.
62	FRANCISCO SANCHEZ ZAYAS	SES-104 form for student E.P.C. (student ID xxxx2691) at school 52076 signed by	Name and signature of E.P.C.

	and SHEILLA PAGAN CARRASQUILLO	Francisco Sanchez Zayas dated January 30, 2013	
63	FRANCISCO SANCHEZ ZAYAS	SES-104 form for student K.R.M. at school 52076 signed by Francisco Sanchez Zayas dated January 30, 2013	Name and signature of K.R.M.
64	FRANCISCO SANCHEZ ZAYAS	SES-104 form for student K.T.C. (student ID xxxx6483) at school 20263 signed by Francisco Sanchez Zayas for March 2012	Name and signature of K.T.C.
65	FRANCISCO SANCHEZ ZAYAS	SES-104 form for student K.M.F. (student ID xxxx8872) at school 20321 signed by Francisco Sanchez Zayas dated March 25, 2013	Name and signature of K.M.F.
66	ANITA ORTIZ RODRIGUEZ and SHEILLA.PAGAN CARRASQUILLO	SES-104 form for student F.R.M. (student ID xxxx4078) at school 52530 signed by Anita Ortiz Rodriguez dated February 11, 2013	Name and signature of F.R.M.
67	YAMARIS TORRES ORTIZ and SHEILLA PAGAN CARRASQUILLO	SES-104 form for student B.L.R. (student ID xxx1189) at school 58594 signed by Yamaris Torres Ortiz dated April 4, 2013	Name and signature of B.L.R.
68	ANITA ORTIZ RODRIGUEZ and SHEILLA PAGAN CARRASQUILLO	SES-104 forms for student Y.V.Y. (student ID xxxx4558) at school 52084 signed by Anita Ortiz Rodriguez dated May 29, 2012	Name and signature of Y.V.Y.
69	YAMARIS TORRES ORTIZ and FRANCISCO SANCHEZ ZAYAS and SHEILLA PAGAN CARRASQUILLO	SES-104 forms for student K.A.R. (student ID xxxx5365) at school 51433 signed by Yamaris Torres Ortiz on March 5, 2013	Name and signature of K.A.R.
70	NORAIMA MERCADO VAZQUEZ	SES-104 for student N.H.R. (student ID xxxx4871) at school 11908 signed by Noraima Mercado Vazquez dated May 1, 2012	Name and signature of N.H.R.
71	MILLIAM CENTENO SOTO	SES-104 for student B.L.A. (student ID xxxx8337) at school 17384 signed by Milliam Centeno Soto dated April 18, 2012	Name and signature of B.L.A.
72	ANNERYS RODRIGUEZ APONTE	SES-104 for student M.C.R. (student ID xxxx5632) at school 36355 signed by Annerys Rodriguez Aponte dated June 14, 2012	Name and signature of M.C.R.

73	JAVIER REYES LOPEZ	SES-104 for student S.M.V. (student ID xxxx6961) at school 71589 signed by Javier Reyes Lopez dated May 5, 2012	Name and signature of S.M.V.
74	LUISA GARCIA ARRIAGA	SES-104 for student J.S.H. (student ID xxxx7676) for school 71589 signed by Luisa Garcia Arriaga dated May 30, 2012	Name and signature of J.S.H.
75	BRENDA PEREZ GARCIA and EILEEN GUTIERREZ STONE	SES-104 form from student Y.M.R. (student ID xxxx1670) at school 62836 signed by Eileen Gutierrez Stone dated March 26, 2013	Name and signature of Y.M.R.
76	MARIA PLAZA and ARACELIS RIVERA RIVERA	Biometric entries for student A.L.S. at school 50229 on January 30, 2012	Name of A.L.S.
77	WANDA FIGUEROA FIGUEROA and MARIAM CANDELARIA	Biometric entries for student C.S.M. at school 51458 on November 13, 2012	Name of C.S.M.
78	ANNETTE COPPIN BALD	Biometric entries for student J.V.F. at school 62901 on February 1, 2012	Name of J.V.F.
79	IDALIS TORRES TORRES	Biometric entries for student A.D.D.J. at school 36335 on February 21, 2012	Name of A.D.D.J.
80	JESSICA MARRERO SANTANA	Biometric entries for student A.G.R. at school 61374 on March 8, 2012	Name of A.G.R.
81	KEILA SILVA SANCHEZ	Biometric entries for student L.P.R. at school 69146 on February 7, 2012	Name of L.P.R.
82	MONICA ORTIZ ALICEA	Biometric entries for student K.V.O. at school 71598 on January 26, 2012	Name of K.V.O.
83	NAYDA TORRES DE LEON	Biometric entries for student J.R. at school 44545 on February 14, 2012	Name of J.R.
84	GUILLERMO MORALES MUÑIZ	Biometric entries for student J.B.F. at school 65987 on February 7, 2012	Name of J.B.F.
85	RAQUEL ROMAN BONILLA	Biometric entries for student D.L.C. at school 10892 on February 21, 2012	Name of D.L.C.
86	JOEL TORRES BELTRAN	Biometric entries for student Ki.C.A. at school 43794 on January 26, 2012	Name of Ki.C.A.
87	LAURIE BAERGA CASTRO	Biometric entries for student B.L.R. at school 58594 on November 15, 2012	Name of B.L.R.
88	ANGEL VELEZ ROSA	Biometric entries for student I.F.D.J. at school 67934 on March 11, 2013	Name of I.F.D.J.
89	FLORENTINO PEREZ GONZALEZ	Biometric entries for student S.V.D.J. at school 67934 on March 11, 2013	Name of S.V.D.J.
90	IVELISSE	Biometric entries for student E.R.V. at	Name of E.R.V.

	VAZQUEZ GARCIA	school 65268 on November 28, 2012	
91	MARITZA ROSARIO MEDINA	Biometric entries for student E.J.S.S. at school 51458 on January 22, 2013	Name of E.J.S.S.
92	ANA OBEN	Biometric entries for student L.R.R. at school 21279 on December 4, 2012	Name of L.R.R.
93	MARGARITA ARROYO HEREDIA	Biometric entries for student E.C.G. at school 51458 on January 28, 2013	Name of E.C.G.

59. Each Count a separate and distinct violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

Forfeiture Allegation

60. The allegations contained in Count One through Twenty Eight of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

61. Upon conviction of one or more of offenses alleged in Count One through Twenty Eight of this Indictment, the defendants herein shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, the following:

- a. All monies and/or property constituting, or derived from, proceeds traceable to the offense;
- b. Monies and/or property held by Rocket Learning, LLC in the custody of BankUnited, National Association with account number 709910649;
- c. Monies and/or property held by Rocket Learning, LLC in the custody of Banco Popular de Puerto Rico with account number 035277092;
- d. Money Judgment against the defendants for a sum of money representing the amount of proceeds traceable to the offenses and scheme totaling approximately \$954,297.00;

62. If any of the above-described forfeitable property, as a result of any act or omission of the defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to

Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c).

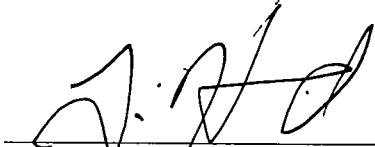
63. All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

TITLE BILL

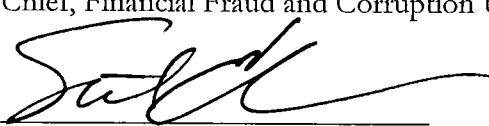
FOREPERSON

Date: 02-17-2016

ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney


Timothy R. Henwood
First Assistant United States Attorney
Acting Chief, Criminal Division


Jose Capo Iriarte
Assistant United States Attorney
Chief, Financial Fraud and Corruption Unit


Seth A. Erbe
Assistant United States Attorney